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*Jeff Moss and DEF CON Communications, Inc.*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

CHRISTOPHER J. HADNAGY, an individual;  
and SOCIAL-ENGINEER, LLC, a  
Pennsylvania limited liability company,

Plaintiffs,

v.

JEFF MOSS, an individual; DEF CON  
COMMUNICATIONS, INC., a Washington  
corporation; and DOES 1-10; and ROE  
ENTITIES 1-10, inclusive,

Defendants.

Case No.: 2:23-cv-01345

**STIPULATION FOR EXTENSION OF  
TIME TO RESPOND TO  
COMPLAINT**

**(First Request)**

Pursuant to LR II 7.1 and LR IA 6-1, Plaintiffs Christopher Hadnagy and Social-Engineer LLC ("Plaintiffs") by and through their counsel of record, Riklis Law, PLLC and Defendants

1 Jeff Moss and Def Con Communications (“Defendants”) by and through their counsel of record,  
2 Holland & Hart, LLP, hereby stipulate as follows:

3 1. Plaintiff filed its Complaint in the Eighth Judicial District Court in and for Clark  
4 County, Nevada, Case No. A-23-875618-C on August 9, 2023. *See* ECF No. 1.

5 2. Defendants were served with the Complaint on August 10, 2023.

6 3. Defendants filed their Notice of Removal on Tuesday, August 29, 2023. ECF No.

7 1. Accordingly, pursuant to FRCP 81, Defendants’ deadline to file a response to the Complaint  
8 is Tuesday, September 5, 2023.

9 4. The parties agree to an extension from Tuesday, September 5, 2023 until Monday,  
10 October 2, 2023, for Defendants to respond to Plaintiffs’ Complaint.

11 5. The stipulated extension is necessary to accommodate previously scheduled  
12 travel for several members of Defendants’ case team and to provide adequate time for counsel  
13 to analyze the Complaint and prepare Defendants’ response thereto.

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6. This is the parties' first request for an extension to respond to the Complaint. This stipulated extension is made in good faith and not for purposes of delay.

DATED this 1st day of September 2023.

DATED this 1st day of September 2023.

**HOLLAND & HART LLP**

**RIKLIS LAW, PLLC**

/s/ Robert J. Cassity

/s/ Kristofer Z. Riklis, Esq.

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*Jeff Moss and DEF CON Communications,*  
*Inc.*

**ORDER**

IT IS SO ORDERED.

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U.S. DISTRICT/MAGISTRATE JUDGE

Dated: \_\_\_\_\_

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